STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: ILD095782859 IEPA Number: 1438058006

Facility Name: Sherex Chemical Company Inc.

Street: Route #24, P.O. Box 9
City: Mapleton Telephone: 309/697-6220
County: Peoria State: Ill. Zip Code: 61549

Type of Facility: Notified As: Gen./TSD Regulated As: Gen./TSD
LDF? yes __ no X HPV? yes __ no X 90 Day Follow-up Required? yes __ no __

Region: 3 Date of Inspection: 6-15-89 From: 9:45 a.m. to 2:30 p.m.
Weather (LDF Only): _____

Type of Inspection
ISS: X Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of _____: __ Other: __

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 8/18/80, from initial ✓ or subsequent __ notification.

Part A date, 4/13/82, from initial __ or amended ✓ Part A.

Part B permit application submitted? yes X no __

Has the firm been referred to: USEPA? yes __ no __; IAG? yes __ no __; County States Attorney? yes __ no __. Date of referral to USEPA: _____, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____
(CACO)-USEPA COMPLIANCE ORDER ISSUED: _____
(CAFO)-USEPA FINAL Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

| Activity(By Process Code) | On Pt A | Activity Conducted Prior to 1980 | Was Activity Ever Done | Closed | Being Done at Time of Inspection | Exempt From Regulation per 35 IAC, Section: | On Annual Report For 86 | 87 | 88 |
|---|---|---|---|---|---|---|---|---|---|
| S01 | yes | | yes | no | yes | no | yes | yes | yes |
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EPA Region 5 Records Ctr.
384007

# NARRATIVE

This facility was inspected on June 15, 1989, from 9:45 a.m. to 2:30 p.m. This inspection was conducted by Mitch Smith and John Tripses of DLPC/FOS, Peoria Region. We interviewed Mr. Serin Rao, Plant Environmental Engineer for Sherex Chemical Company.

The facility originally filed a Part A for storage in containers in April of 1982. The facility filed a Part B application for storage in containers in two areas on November 7, 1988; this application is still in the review process (see Part B application, Part B log #111). Storage area #1 is located on the north side of the Quality Control Lab at the northeast corner of the Pilot Plant and Fatty Acid Plant, Storage #2 is located on the south side of the warehouse building (see site sketch for exact locations).

Sherex Chemical Company is a producer of fatty acid derivatives: primary, secondary, tertiary, and quaternary Amines; fatty alcohols; and plasticizers. From this operation the facility generates four continuous hazardous waste streams: chlorinated solvent, non-chlorinated solvent, mercury waste and waste naptha. A spent Copper/Cadmium catalyst waste stream has been discontinued due to a process change. The last manifested shipment for this material was February 28, 1989.

The waste chlorinated solvents used at Sherex are Carbon Tetrachloride and Chloroform. These solvent wastes are generated from quality control work in the laboratory and stored in storage area #1 (see site sketch and photograph #1). The last manifested shipment was March 14, 1989, to Solvent Resource Recovery Inc. (OHD 093 945 293), West Carrollton, Ohio, to be incinerated. There was 1 drum of this material in the storage area and it was designated F002.

Methanol, Ethanol, Propanol, Toluene, n-Butanol and Pyridine are the waste non-chlorinated solvents used at Sherex. These solvents are also generated as a result of quality control work in the laboratory and stored in storage area #1 (see site sketch and photograph #1). The last manifested shipment was March 14, 1989, to Solvent Resource Recovery Inc. (OHD 093 945 293), West Carrollton, Ohio, to be incinerated. There were 4 drums of this material in the storage area and it was designated F003 and F005.

Waste Mercury is generated in the Quality Control Lab and stored in storage area #1 (see site sketch and photograph #2). The facility has never had a shipment of this waste. There were (4) 5-gallon pails of this material in the storage area designated D009.

Waste Naptha is generated throughout the plant in parts washers provided by Safety-Kleen. This material is generated at approximately 50 gallons per month and is collected on a monthly basis. The last shipment was June 5, 1989, to Safety-Kleen (179 060 0011), Pekin, Illinois, to be recycled. This material was designated D001.

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Agency personnel departed at 2:30 p.m.

During the inspection and the tour of the facility, the following apparent violations of 35 Ill. Adm. Code, Subtitle G were observed:

Section 725.131 - Sherex failed to operate their facility in a manner which would not threaten human health or the environment. A drum of non-chlorinated solvent was observed open during storage in storage area #1. This was corrected during the inspection and will not be cited in a CIL.

Section 725.273(a) - A drum of non-chlorinated solvent was observed open during storage in storage area #1. This was corrected during the inspection and will not be cited in a CIL.

MTS/lb

# WASTE DISPOSITION FORM

Facility Name: Sherex Chemical Co. inc. USEPA #: IHD095792859 IEPA #: 145805 00006

| Waste Name (Include haz & non-haz special & waste for which no determination has been made) | Generating Process (For waste gen. on site. N/A for TSD) | Date of Last Analysis | USEPA Haz Waste # | On 8700-12 * | On 3510-3 * | On Annual Rpt For 86 * | 87 * | 88 * | Amount On Site | Rate of Generation | Last Manifested Shipment | Disposition | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Spent Copper/cadmium | HPA Catalyist | 12-29-86 | D006 | yes | no | yes | yes | yes | none | process ceased | 2-28-89 | landfilled IND 078911 | 146 |
| Non-chlorinated Solvent Waste | lab Waste | 10-6-88 | F003 F005 | yes | yes | no | yes | yes | 4 drums | 160 gal./ Month | 3-14-89 | Incinerated OHD 093945 | 293 |
| Chlorinated Solvent Waste | lab Waste | 5-30-88 | F002 | yes | yes | no | yes | yes | 1 drum | 55 gal./ Month | 3-14-89 | Incinerated OHD 093945 | 293 |
| Mercury Waste | lab Waste | 5-18-89 | D009 | yes | yes | no | no | yes | 20 gal. | 5 gal./ Month | no Shipments | never shipped | |
| Waste Naptha | Parts Cleaner | 12-18-87 | D001 | yes | yes | no | yes | yes | 50 gal. | 50 gal./ Month | 6-05-89 | recycled 179 060 0011 | |

INSPECTION SUMMARY

Sherex's laboratory is the only source that generates F003 (methanol and butyl alcohol) and F005 (toluene and pyridine) solvent wastes at the facility. The wastes are generated by the laboratory as part of their product quality control program. The methanol and butyl alcohol are used as solvents for standard solutions. The toluene and pyridine are used to solubilize chemical mixtures.

According to Norman Lafond, Sherex's Chief Control Chemist, the above solvents are bought and used in pure form. The laboratory generates about 25% F003 waste and 75% F005 waste. These wastes are co-mingled. Approximately, one (1) fifty-five (55) gallon drum of the wastes are generated every 3-4 weeks.

Facility records indicate that only one (1) shipment of "F" solvent wastes has been manifested from the site in 1988 (See attached Il. manifest 1787924). The manifest was not accompanied by Form A as required by Section 268.7(a)(1). This information was confirmed by Vicki Kilburn, Compliance Co-ordinator for Chemical Waste Management, telephone 513/859-6101, during a telephone conversation with the writer on September 28, 1988. Also, the service agreement between Sherex and Chemical Waste Management is attached to this report.

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## NARRATIVE

Mitch Smith (this author) of DLPC/FOS, Peoria Region, and Tod Rowe of DLPC/Permits conducted a facility visit to Sherex Chemical Co. Inc. on January 23, 1990. Agency personnel arrived at 09:30. The purpose of the visit was to answer some questions regarding the facility's part B permit application and to tour the site. Agency personnel interviewed Serin Rao, Plant Environmental Engineer for Sherex Chemical.

Tod Rowe and Mr. Rao discussed the permit application. Agency Personnel and Mr. Rao conducted a facility tour. Special attention was paid to the 2 permitted storage areas (see site sketch and photographs #1 and #2) and past and present SWMUs (Solid Waste Management Units). It was decided that these units would be best addressed in an upcoming RFA inspection. Agency personnel departed at 12:30.

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